

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

In re:  JOANNE M. SULLIVAN,  Debtor.	Chapter 13 Case No. 16-12616
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**ASSENTED-TO MOTION TO EXTEND DEADLINE  
TO RESPOND TO DEBTOR'S OBJECTION TO  
NOTICE OF PAYMENT CHANGE AND MOTION TO DETERMINE**

NOW COMES U.S. Bank Trust National Association, as Trustee of the Tiki Series III Trust as serviced by BSI Financial Services ("U.S. Bank Trust") and respectfully requests, with the assent of counsel for Joanne M. Sullivan (the "Debtor"), that this Court extend the deadline for U.S. Bank Trust to respond to the Objection to Notice of Payment Change and Motion to Determine (the "Objection") filed on July 31, 2019. As reasons therefore, U.S. Bank Trust is currently reviewing the issues raised in the objection and shall be working, through undersigned counsel, with Debtor's counsel to try and resolve the dispute without the need for a hearing.

WHEREFORE, U.S. Bank Trust respectfully requests that this Court enter an order extending U.S. Bank Trust's deadline to respond to the Objection to Friday, September 6, 2019, reschedule the hearing to date convenient to the Court, and further relief as is just and proper.

*Signature Page to Follow*

Respectfully submitted,

U.S. BANK TRUST NATIONAL ASSOCIATION, AS  
TRUSTEE OF THE TIKI SERIES III TRUST AS  
SERVICED BY BSI FINANCIAL SERVICES,

By its attorneys,

/s/ Michael E. Swain

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DATE: August 22, 2019

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**CERTIFICATE OF SERVICE**

I, Michael E. Swain, Esq. of the law firm of Sassoon & Cymrot, LLP, hereby certify that I have this 22nd day of August 2019 served on behalf of U.S. Bank Trust National Association as Trustee of the Tiki Series III Trust as serviced by BSI Financial Services, an Assented-to Motion to Extend Deadline to Respond to Debtor's Objection to Notice of Payment Change and Motion to Determine and this Certificate of Service by causing copies hereof to be sent by electronic mail via the Case Management / Electronic Case Files (ECF) system, and by first-class U.S. mail (M) to all parties not appearing electronically but entitled to service, per the Federal Rules of Bankruptcy Procedure.

Joanne M. Sullivan 21 Brooksweld Road Canton, MA 02021 (M)	Elaine M. Benkoski East Brook Executive Park 30 Eastbrook Road, Suite 301 Dedham, MA 02026 (ECF)
John Fitzgerald Office of US. Trustee J.W. McCormack Post Office & Courthouse 5 Post Office Sq., 10th Fl, Suite 1000 Boston, MA 02109 (ECF)	Carolyn Bankowski-13 Chapter 13 Trustee Boston P. O. Box 8250 Boston, MA 02114 (ECF)

*/s/ Michael E. Swain, Esq.*  
Michael E. Swain, Esq.